

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Hurricane Electric LLC
Plaintiff(s),
vs.
Millennium Funding, Inc. et al.
Defendant(s).

Case # 2:20-cv-01034

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Neil D. Greenstein, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of
TechMark Greenstein Law, P.C.

(firm name)

with offices at 1751 Pinnacle Drive, Suite 1000
(street address)

Tysons, Virginia, 22102
(city) (state) (zip code)

347-514-7717, ndg@techmark.com
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
Hurricane Electric LLC to provide legal representation in connection with
[client(s)]
the above-entitled case now pending before this Court.

3. That since June 7, 1979, Petitioner has been and presently is a
 (date)
 member in good standing of the bar of the highest Court of the State of Virginia
 (state)
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
 possession of the United States in which the applicant has been admitted to practice law certifying
 the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
 of other States on the dates indicated for each, and that Petitioner is presently a member in good
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
See Attached Exhibit A		

5. That there are or have been no disciplinary proceedings instituted against petitioner,
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

NONE

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

NONE

7. That Petitioner is a member of good standing in the following Bar Associations.

Wisconsin and California

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
None in last 3 years			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.

STATE OF Nevada }
COUNTY OF Clark }

Neil D. Greenstein
Petitioner's signature

Neil D. Greenstein, Petitioner, being first duly sworn, deposes and says:
That the foregoing statements are true.

Neil D. Greenstein
Petitioner's signature

Subscribed and sworn to before me this

23rd day of June, 2020

Karen Rodman
Notary Public or Clerk of Court



**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
believes it to be in the best interests of the client(s) to designate Joshua M. Dickey,
(name of local counsel)
Attorney at Law, member of the State of Nevada and previously admitted to practice before the
above-entitled Court as associate resident counsel in this action. The address and email address of
said designated Nevada counsel is:

c/o Bailey Kennedy, 8984 Spanish Ridge Avenue
(street address)

Las Vegas, Nevada, 89148
(city) (state) (zip code)

702-562-8820, jdickey@baileykenedy.com
(area code + telephone number) (Email address)

1 By this designation the petitioner and undersigned party(ies) agree that this designation constitutes
2 agreement and authorization for the designated resident admitted counsel to sign stipulations
3 binding on all of us.

4
5 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

6
7 The undersigned party(ies) appoint(s) Joshua M. Dickey as
8 his/her/their Designated Resident Nevada Counsel in this case. (name of local counsel)

9
10 Mike Leber
11 (party's signature)

12 Hurricane Electric LLC by Mike Leber, Managing Member
(type or print party name, title)

13
14 (party's signature)

15
16 (type or print party name, title)

17 **CONSENT OF DESIGNEE**

18 The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

19
20 Joshua M. Dickey
Designated Resident Nevada Counsel's signature

21 6621

22 Bar number

JDickey@BaileyKennedy.com

Email address

23 APPROVED:

24 Dated: this _____ day of _____, 20____.

25
26 _____
27 UNITED STATES DISTRICT JUDGE

EXHIBIT A

Exhibit A to Application for *pro hac vice* admission
of Neil D. Greenstein to the United States District Court
District of Nevada

State Court Bar Admissions – Neil D. Greenstein

<u>Court</u>	<u>Date Admitted</u>	<u>Current Standing</u>	<u>Bar No.:</u>
Virginia State Bar	5/16/79	Active/Good Standing	18555
Virginia Supreme Court	6/7/79	Good	
Wisconsin Supreme Court	10/12/82	Active/Good Standing	1013575
California Supreme Court	9/29/86	Active/Good Standing	123980

Federal Court Bar Admissions – Neil D. Greenstein

The two courts asterisked below require payment of fees to maintain active status. Since I do not regularly practice in these courts, I elected not to pay the fees. However, my understanding is that I am eligible for "active status" in both of these courts upon payment of the applicable fees and completion of "standard" forms such as the ECF Registration form.

<u>Court</u>	<u>Date Admitted</u>	<u>Current Standing</u>	<u>Bar No.:</u>
United States Court of Appeals for the Fourth Circuit	6/7/79	Good	None
United States Tax Court	11/13/80	Inactive*	None
United States District Court for the Eastern District of Virginia	3/9/81	Good	None
United States Supreme Court	6/28/82	Good	None
United States Court of Appeals for the Federal Circuit	1982 (Previously admitted to predecessor courts, Court of Claims and Court of Customs and Patent Appeals) (10/31/80)	Good	None

<u>Court</u>	<u>Date Admitted</u>	<u>Current Standing</u>	<u>Bar No.:</u>
United States Court of Appeals for the Seventh Circuit	2/19/82	Good	None
United States District Court for the Eastern District of Wisconsin	6/1/83	Good	None
United States District Court for the Western District of Wisconsin	10/11/85	Good	None
United States District Court for the Northern District of California	8/28/86	Good	123980
United States Court of Appeals for the Ninth Circuit	9/19/86	Good	None
United States District Court for the Central District of California	6/29/87	Good	None
United States District Court for the Eastern District of California	5/1/89	Good	None
United States District Court for the District of Nebraska	1/25/90	Inactive*	None
United States District Court for the Southern District of California	4/6/90	Good	None
United States District Court for the Northern District of Illinois	9/22/00	Good	90785063
United States District Court for the Eastern District of Michigan	9/17/02	Good	None
United States District Court for the Northern District of Texas	11/26/02	Good	None
United States District Court for the District of Colorado	7/14/03	Good	None
United States District Court for the Eastern District of Texas	9/28/06	Good	None
United States District Court for the Northern District of Indiana	7/5/07	Good	None

United States District Court for the Western District of Texas	8/5/19	Good	123980
United States District Court for the Southern District of Indiana	12/6/19	Good	None

I have also been admitted to practice *pro hac vice* to the following Federal District Courts at various times throughout my career (some of these courts I am now admitted fully):

United States District Court for the Southern District of New York

United States District Court for the Eastern District of New York

United States District Court for the Middle District of Florida

United States District Court for the Southern District of Florida

United States District Court for the Southern District of Texas

United States District Court for the Western District of Texas

United States District Court for the Northern District of Texas

United States District Court for the Eastern District of Louisiana

United States District Court for the Western District of Washington

United States District Court for the District of Oregon

United States District Court for the District of Nevada

United States District Court for the District of Arizona

United States District Court for the Southern District of West Virginia

United States District Court for the District of Maryland

United States District Court for the Eastern District of North Carolina

United States District Court for the District of Massachusetts

I am admitted to practice before the United States Patent & Trademark Office:

<u>Date Admitted</u>	<u>Current Standing</u>	<u>Registration No.:</u>
12/8/78	Active/Good Standing	29,159

I have also been admitted to practice *pro hac vice* to the following State Courts at various times throughout my career :

State of South Carolina, County of Horry

State of Florida, County of Palm Beach

EXHIBIT B

Supreme Court of Virginia

AT RICHMOND

Certificate

I, Douglas B. Robelen, Clerk of the Supreme Court of Virginia,
do hereby certify that

NEIL DAVID GREENSTEIN

was admitted to practice as an attorney and counsellor at the bar of this Court on
June 7, 1979.

I further certify that so far as the records of this office are
concerned, NEIL DAVID GREENSTEIN is a member of the bar of this
Court in good standing.

Witness my hand and seal of said Court

This 15th day of June

A.D. 2020

By: 

Deputy Clerk



Sheila T. Reiff
Clerk

WISCONSIN SUPREME COURT

OFFICE OF THE CLERK

110 E. Main Street, Suite 215
P.O. Box 1688
Madison, WI 53701-1688

Telephone: 608-266-1880
TTY: 800-947-3529
Fax: 608-267-0640
<http://www.wicourts.gov>

CERTIFICATE OF GOOD STANDING

I, Sheila T. Reiff, Clerk of the Supreme Court of Wisconsin certify that the records of this office show that:

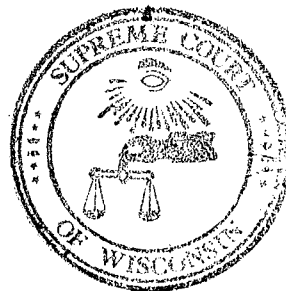
NEIL D. GREENSTEIN

was admitted to practice as an attorney within this state on October 12, 1982 and is presently in good standing in this court.

Dated: June 12, 2020

A handwritten signature in cursive script, appearing to read "Sheila T. Reiff".

SHEILA T. REIFF
Clerk of Supreme Court





Supreme Court of California

JORGE E. NAVARRETE

Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

NEIL DAVID GREENSTEIN

I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that NEIL DAVID GREENSTEIN, #123980, was on the 29th day of September 1986, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 11th day of June 2020.*

JORGE E. NAVARRETE

Clerk/Executive Officer of the Supreme Court

By: 

M. Alfaro, Deputy Clerk